

## **Attachment 6**

# **Appendix C**

## **Turbine A06 Analysis of Incremental Environmental Impacts**

## TURBINE A06 ANALYSIS OF INCREMENTAL ENVIRONMENTAL IMPACTS

As described in Section 4.1 of the Supplemental and Amended Site Permit Application (Amended Application), Big Bend includes 52 turbine positions in the Amended Application and one additional alternative turbine, Turbine A06, detailed in this Appendix C. Based on coordination with the Air National Guard and U.S. Air Force, there is a military training route near the eastern edge of the Project Area. As such, Big Bend previously removed the eastern most-turbine from the proposed layout (formerly Turbine 37, also known as Turbine A06) to mitigate military airspace concerns. While Big Bend has coordinated independently with the U.S. Department of Defense (DoD) (see attached letter from DoD on this flight path related to Turbine A06, formerly T37), as part of the Settlement Agreement, the Parties agree to jointly and in good faith coordinate with DoD to gain concurrence that a wind turbine could be sited in the approximate location of A06 (formerly Turbine 37). The Parties commenced that coordination in September 2021. Because this turbine position is dependent on DoD concurrence, Big Bend provides a separate analysis of environmental impacts below.

If constructed, Turbine A06 would permanently impact 0.9 acre, including the turbine pad and permanent access road, all of which would be within cultivated cropland. Temporary impacts would total 41.5 acres; 98 percent of the temporary impacts would affect cultivated cropland and two percent would affect developed land. Temporary impacts would be associated with crane walkways, the installation of underground collection lines, workspace around turbines, and a wider access road for use by construction vehicles and equipment. Table 1 presents a summary of permanent and temporary environmental impacts associated with Turbine A06. Figures depicting Turbine A06 are provided below.

Table 1 Environmental Analysis of Turbine A06		
Environmental Features	Permanent	Temporary
<b>General</b>		
Turbine (acres)	0.2	2.7
Access Road (acres)	0.7	5.7
Crane Path (acres)	--	12.4
Collection Line (acres)	--	20.7
<b>Proximity to Residences</b>		
Nearest Participating Residence (feet)	1,304	
Nearest Non-Participant Residence (feet)	3,160	
<b>Proximity to Communication Systems</b>		
Nearest Communication Tower (feet)	10,507	
Nearest Land Mobile Communication Antenna (feet)	3,406	
<b>Prime Farmland</b>		
Total All Categories of Prime Farmland (acres)	0.9	40.6
Farmland of State Importance (acres)	--	0.9
<b>Land Cover (2016 National Land Cover Data, Yang et al., 2018)</b>		
Cultivated Crop Land (acres)	0.9	40.6

<b>Table 1 Environmental Analysis of Turbine A06</b>		
<b>Environmental Features</b>	<b>Permanent</b>	<b>Temporary</b>
Developed Areas (acres)		0.9
<b>Wetlands (Minnesota's Update to National Wetland Inventory)</b>		
Palustrine Emergent Wetland (acres)	--	0.2
Riverine (acres)	--	0.1
<b>FEMA-designated Flood Zones</b>		
Total FEMA-designated 100-year floodplains (acres)	--	1.3

Turbine A06 would be sited within the Agricultural District in Watonwan County. The nearest participating residence to Turbine A06 is 1,304 feet to the north and the nearest non-participating residence is 3,160 feet to the east/southeast. The nearest airport is the St. James Municipal Airport, which is 8.3 miles east of Turbine A06.

Noise and shadow flicker modeling included Turbine A06. Table 2 below summarizes modeled noise and shadow flicker for each of the three proposed turbine models at the closest participating and non-participating residences identified above.

<b>Table 2 Modeled Noise and Shadow Flicker at Residences near Turbine A06</b>						
	<b>Turbine-Only Noise, L<sub>50</sub> (dBA)</b>			<b>Shadow Flicker (hr/yr)</b>		
	<b>N-163</b>	<b>V162</b>	<b>GE-158</b>	<b>N-163</b>	<b>V162</b>	<b>GE-158</b>
Closest Participating Residence (ID-16)	43	45	45	22:12	21:58	19:23
Closest Non-Participating Residence (ID-614)	35	36	37	12:50	12:47	12:02

The co-located collection lines and crane path to Turbine A06 would cross the Riverside Trail where the snowmobile trail is co-located with County Road 5, north of the Town of Butterfield. No additional designated recreation areas or trails would be affected by construction or operation of Turbine A06.

No permanent wetland impacts would occur from construction of Turbine A06. Based on review of the NWI data, temporary impacts on wetlands may occur from the use of crane paths and installation of collection lines during construction of Turbine A06. None of the wetlands that would be temporarily impacted during construction are MNDNR-designated PWI wetlands. Temporary impacts associated with the use of crane paths will be minimized by the use of matting during construction. Installation of underground utilities is expected to minimize impacts to wetlands or where possible make them coincident with other impacts (e.g., crane paths).

Construction of Turbine A06 would not permanently impact FEMA-designated floodplains, though crane paths and collection lines would cross FEMA-designated 100-year floodplain area in Watonwan County (FEMA, 1985). These impacts are expected to be minimal and would only occur during construction.

Turbine A06 would not affect conservation easements, previously recorded cultural resources, surface waters, native prairie areas, native plant communities or Sites of Biodiversity Significance. Big Bend also does not anticipate any impacts to communication systems, including radio, television, cellular towers, or broadband services if Turbine A06 is constructed. Incremental

effects on public services and infrastructure and local transportation are not anticipated if Turbine A06 is constructed.

**References:**

- Federal Emergency Management Agency (FEMA). 1985. FIRM panel 270649A – Unincorporated areas of Watonwan County. Available online at: <https://msc.fema.gov/portal/advanceSearch#searchresultsanchor>. Accessed August 2020.
- Yang, L., Jin, S., Danielson, P., Homer, C., Gass, L., Case, A., Costello, C., Dewitz, J., Fry, J., Funk, M., Grannemann, B., Rigge, M. and G. Xian. 2018. A New Generation of the United States National Land Cover Database: Requirements, Research Priorities, Design, and Implementation Strategies, ISPRS Journal of Photogrammetry and Remote Sensing, 146, pp.108-123



## DEPARTMENT OF THE AIR FORCE

WASHINGTON, DC 20330-1000

### OFFICE OF THE ASSISTANT SECRETARY

FROM: SAF/IEIM  
1665 Air Force Pentagon  
Washington DC 20330-1665

SUBJECT: Big Bend Wind Project (2020-WTE-4685-OE) near Mountain Lake, Minnesota

Dear Mr. Dylan Ikkala,

At your request, the Office of the Air Force Director, Community Partnership and Encroachment Management, hereby provides this letter to document the results of the discussions for Apex Clean Energy's proposed Big Bend Wind Project in Mountain Lake, Minnesota. In June 2019, the 133rd Airlift Wing (AW) of the Minnesota Air National Guard (ANG) requested an informal consult for the proposed Big Bend Wind Project. The 133rd AW and ANG coordinated with the proponent, DARE Strategies, and concurred with the proposed wind turbines with the provision that all obstruction lighting must be night vision goggle compatible. The 133rd AW also noted that any further expansion eastward into the lateral boundaries of SR- 728 should be coordinated with the 133rd AW in advance.

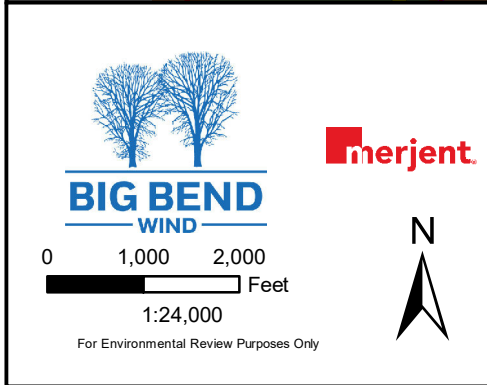
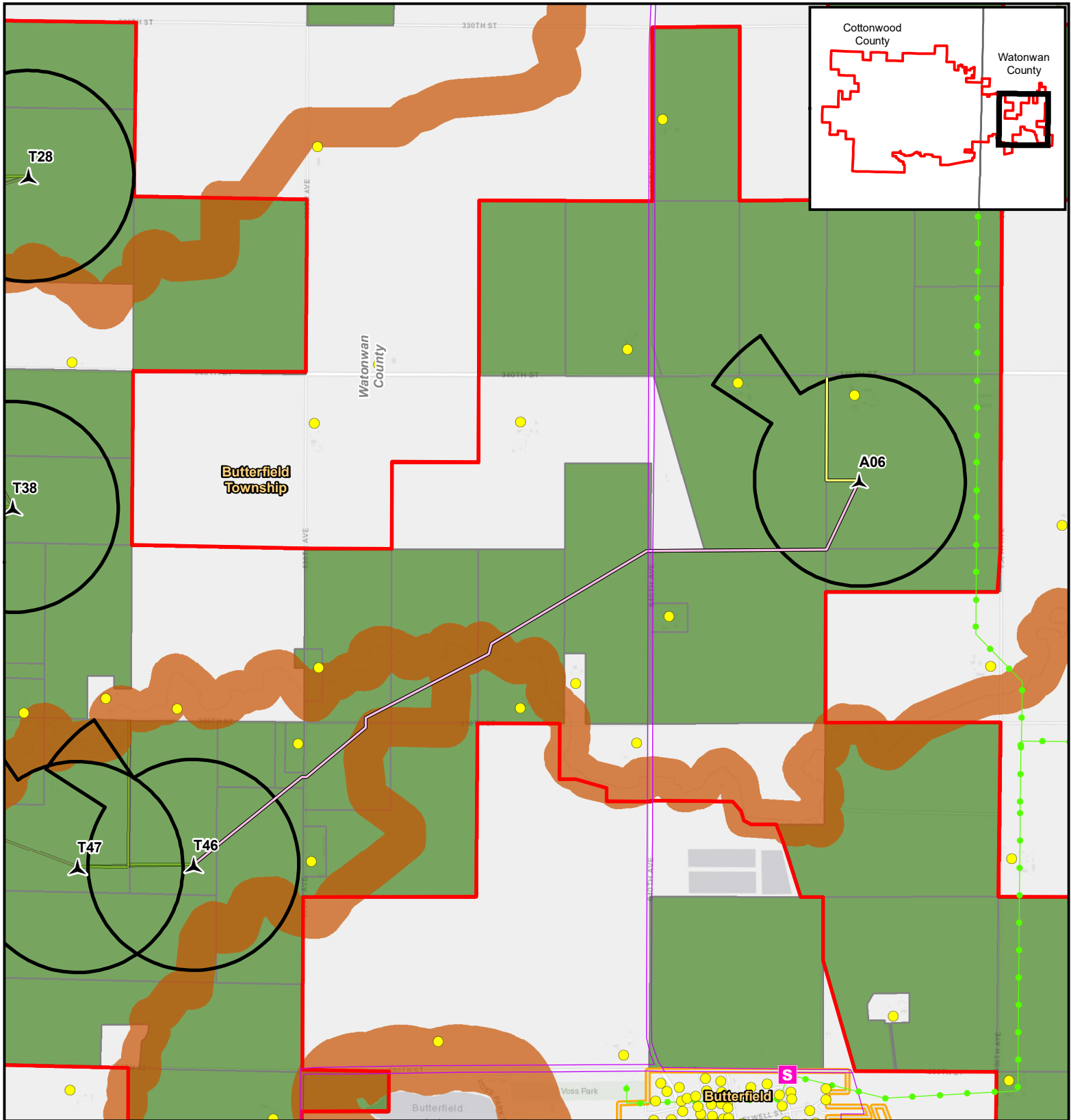
In August 2020, DARE Strategies noted that Apex Clean Energy formally filed the project in the Federal Aviation Administration's Obstruction Evaluation / Airport Airspace Analysis System (OE/AAA). At that time, DARE Strategies explained the project had since expanded and there were eight additional wind turbines east of the county line that were not previously included in the informal consult. The ANG reviewed the updated layout and acknowledged that given its location wind turbine T-37 would cause significant mission impacts and render SR-728 unusable. As originally proposed, wind turbine T-37 was located only 3.4nm from the route boundary at a blind, belly-up right turn. This wind turbine would have forced pilots to climb out of the low-altitude environment to maneuver a C-130 formation. Apex Clean Energy understood the significant mission impacts and agreed to terminate the filing for wind turbine T-37. Once the filing for wind turbine T-37 was terminated, the Department of the Air Force and DoD approved the adjusted layout and cleared the project in OE/AAA.

We appreciate Apex Clean Energy's efforts in working with the Department of the Air Force to reduce mission impacts and identify a shared affordable and feasible solution. Please feel free to reach out to my team at [saf.iei.encroachment@us.af.mil](mailto:saf.iei.encroachment@us.af.mil) with any further questions or concerns.

**JUDD.TERAN.  
L.1093717011**

Digitally signed by  
JUDD.TERAN.L.1093717  
Date: 2021.08.27  
15:56:20 -04'00'

TERAN L. JUDD  
Director, Community Partnership &  
Encroachment Management

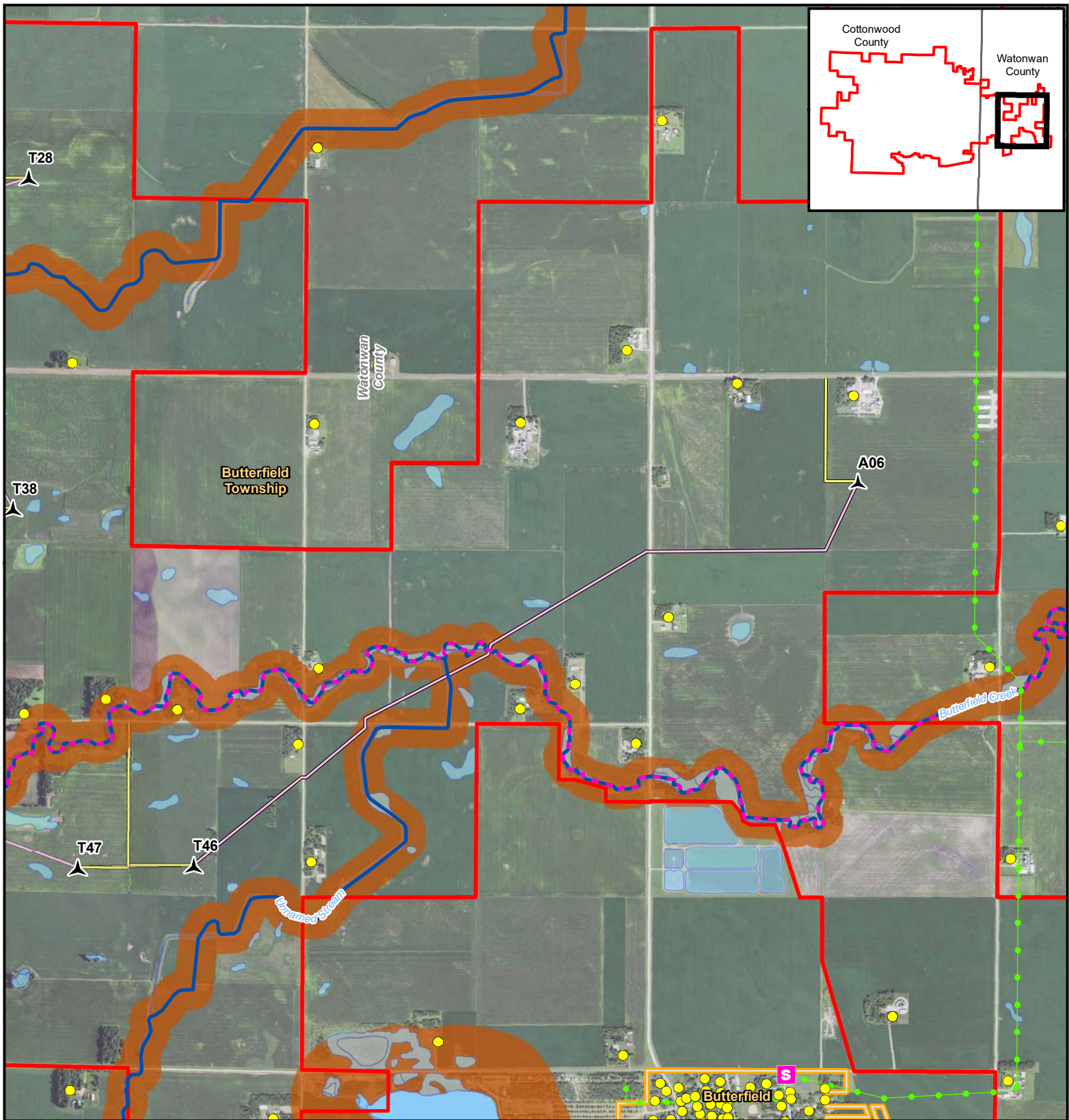



## Appendix C Turbine A06

### Big Bend Wind Project Cottonwood and Watonwan Counties, Minnesota

- |  |                           |
|--|---------------------------|
| ▲ Proposed Turbine   | Project Area Boundary     |
| ● Residential Structure (within 1 mile of Project Area Boundary) | Wind Access Buffer        |
| — Access Road  | Shoreland Management Area |
| — Collection Line  | Participating Parcel      |
| — Crane Path   |                           |
| — Existing Transmission Line                                     |                           |








**BIG BEND**  
WIND


0 1,000 2,000  
Feet

1:24,000

For Environmental Review Purposes Only














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## Appendix C Turbine A06

### Big Bend Wind Project Cottonwood and Watonwan Counties, Minnesota

- |  |  |
|--|--|
| <ul style="list-style-type: none"> <li> Proposed Turbine Residential Structure (within 1 mile of Project Area Boundary)</li> <li> Access Road</li> <li> Collection Line</li> <li> Crane Path</li> <li> Project Area Boundary</li> </ul> | <ul style="list-style-type: none"> <li> Public Water Watercourse</li> <li> Impaired Stream</li> <li> Existing Transmission Line</li> <li> Shoreland Management Area</li> <li> NWI (MNDNR Update)</li> <li> Public Water Basin</li> </ul> |
|--|--|



## **Attachment 7**



**HOGENADAMS**  
Legal Excellence in Indian Country

**Peter J. Rademacher, Associate**

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Direct Dial: (763) 762-8292  
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November 10, 2021

By eDockets

Mr. William Seuffert  
Executive Secretary  
Minnesota Public Utilities Commission  
121 Seventh Place East, Suite 350  
St. Paul, MN 55101

Re: Direct Testimony of Robert L. Larsen for MPUC Docket Numbers IP-7013/CN-408, WS-19-619, and TL-19-621, and OAH Docket Number 60-2500-37376.

Dear Mr. Seuffert,

Enclosed for filing on behalf of the Lower Sioux Indian Community in the State of Minnesota in the above-identified dockets, please find Direct Testimony of Robert L. Larsen.

This letter and the direct testimony have been filed today through eDockets and copies are being served upon the persons on the Official Service Lists of record. Please let me know if you have any questions.

Sincerely,



Peter J. Rademacher

Enclosure

Lower Sioux Indian Community in the State of Minnesota

MINNESOTA PUBLIC UTILITIES COMMISSION

MPUC Docket Nos. IP-7013/CN-19-408, WS-19-619, and TL-19-621  
OAH Docket No. 60-2500-37376

Direct Testimony of  
ROBERT L. LARSEN

November 10, 2021

1 INTRODUCTION

2 Q. Please state your name, affiliation, and title.

3 A. My name is Robert L. Larsen. I'm a member of the Lower Sioux Indian  
4 Community in the State of Minnesota (the "Community") and serve as the  
5 President of its governing body, The Community Council of the Lower Sioux  
6 Indian Reservation (the "Community Council").

7 Q. Are you authorized to provide testimony on behalf of the Community?

8 A. Yes, the Community Council has authorized me by resolution to provide this  
9 testimony on behalf of the Community.

10 OVERVIEW

11 Q. What is the purpose of your testimony?

12 A. I'm testifying to explain (1) the Community's interests in the Big Bend Wind  
13 Project (the "Wind Project"), including the proposed transmission line, and the  
14 Red Rock Solar Project (the "Solar Project") (collectively, the "Projects"), (2) the  
15 Community's involvement in this administrative proceeding, and (3) the  
16 Settlement Agreement among the Community, the Upper Sioux Community, the  
17 Minnesota Historical Society, Apex Clean Energy Holdings, LLC, Big Bend  
18 Wind, LLC, and Red Rock Solar, LLC.

19 THE COMMUNITY'S INTEREST IN THE PROJECTS

20 Q. Can you describe the Community?

21 A. The Community is a federally recognized Indian tribe, 86 Fed. Reg. 7554, 7556  
22 (Jan. 29, 2021), located in Morton, Minnesota.

23 **Q. What is the Community's relationship to the site of the Projects?**

24 A. The Projects are located within territory once inhabited and occupied by the  
25 Community's ancestors and ceded through treaty. The Projects are also located  
26 near the Jeffers Petroglyphs, a historic landmark registered by the State of  
27 Minnesota and the federal government. That site is part of a larger formation  
28 known as the Red Rock Ridge. To the Community, the Jeffers Petroglyphs and  
29 the Red Rock Ridge are priceless sites that bear knowledge passed down through  
30 many millennia, as well as offer important space for spiritual and cultural  
31 practices. There is no other place like it in the entire world.

32 **Q. Based on this relationship, what is the Community's interest in the Projects?**

33 A. As a general matter, the Community supports renewable-energy efforts. That  
34 said, I cannot overstate the importance of the Jeffers Petroglyphs and the Red  
35 Rock Ridge. The Community has a strong interest in protecting these sites from  
36 encroachment, including visual encroachment, which could devastate the  
37 spiritual and cultural use of the sites and contribute to a long history of cultural  
38 genocide that has systematically deteriorated the Community's cultural identity.  
39 In particular, the Community has been concerned about the impact of the Wind  
40 Project to the viewshed from the Jeffers Petroglyphs.

41                   **THE COMMUNITY’S INVOLVEMENT IN THE PROJECTS**

42   **Q.     How long has the Community been involved with the Projects?**

43   A.     To my knowledge, the Community has been involved since 2018, when Big Bend  
44           Wind, LLC and Red Rock Solar, LLC approached us. At that time, the wind  
45           turbines proposed for the Wind Project were too tall and too close to the Jeffers  
46           Petroglyphs, significantly impairing the viewshed.

47   **Q.     How has the Community voiced its concerns about the Projects?**

48   A.     The Community engaged in consultations with Big Bend Wind, LLC and Red  
49           Rock Solar, LLC. Those consultations led them to adjust their original layouts for  
50           the Projects to move the wind turbines further from the Jeffers Petroglyphs.

51   **Q.     Why was the original layout adjustment insufficient?**

52   A.     They did not move the wind turbines far enough, and they increased the heights  
53           of the wind turbines significantly. Consequently, the impact to the viewshed  
54           from the Jeffers Petroglyphs was not sufficiently reduced.

55   **Q.     How has the Community participated in the administrative proceedings for**  
56           **the Projects?**

57   A.     Since Big Bend Wind, LLC and Red Rock Solar, LLC did not sufficiently adjust  
58           the layouts of the Projects before applying for their certificates of need, site  
59           permits, and route permit, the Community chose to intervene as a party and  
60           oppose the site permit for the Wind Project. The Community took an active role



in the adversarial proceeding and has attended public meetings and hearings before the Minnesota Public Utilities Commission and the Minnesota Office of Administrative Hearings.

#### **THE SETTLEMENT AGREEMENT**

**Q. Is there a settlement in this administrative proceeding?**

A. Yes, the Community, the Upper Sioux Community, the Minnesota Historical Society, Apex Clean Energy Holdings, LLC, Big Bend Wind, LLC, and Red Rock Solar, LLC have reached a settlement in this administrative proceeding.

**Q. How did the parties reach this settlement?**

A. Without going into the substance of the discussions, the parties met on sight to discuss compromises that would allow for a feasible project while minimizing impact to the viewshed from the Jeffers Petroglyphs. Through those discussions, the parties agreed to terms, which were detailed in the Settlement Agreement filed by Big Bend Wind, LLC with the Minnesota Public Utilities Commission and the Minnesota Office of Administrative Hearings on September 14, 2021.

**Q. How would you describe the settlement?**

A. The settlement is a compromise by all parties. It is the result of productive, good-faith negotiations. It is not a perfect outcome for the Community, but it is one that the Community supports.

**Q. The settlement includes a revised layout for the Wind Project, correct?**

81 A. Yes, the settlement includes a revised layout for the Wind Project, which will  
82 result in zero to a maximum of two wind turbines constructed within seven  
83 miles of the Jeffers Petroglyphs, but not closer than six-and-a-half miles. Some of  
84 the turbines that were previously within seven miles of the Jeffers Petroglyphs  
85 will be removed from the Wind Project. Others will or may be moved to different  
86 sites beyond seven miles from the Jeffers Petroglyphs.

87 **Q. Does the revised layout of the Wind Project address the Community's**  
88 **concerns about the impact to the viewshed from Jeffers Petroglyphs?**

89 A. Wind turbines will still be in the viewshed from the Jeffers Petroglyphs. But after  
90 reviewing updated visual assessments provided by Big Bend Wind, LLC, the  
91 Community believes that the revised layout significantly reduces the impact to  
92 the viewshed from the Jeffers Petroglyphs. So the Community's concerns are  
93 addressed, and it supports the settlement and the amended site permit  
94 application that Big Bend Wind, LLC filed on September 20, 2021.

95 **CONCLUSION**

96 **Q. Does this conclude your testimony?**

97 A. Yes.

In the Matter of the Application of Big Bend Wind, LLC for a Certificate of Need for the up to 308 MW Big Bend Wind Project in Cottonwood and Watonwan Counties, Minnesota; In the Matter of the Application of Big Bend Wind, LLC for a Large Wind Energy Conversion System Site Permit for the up to 308 MW Big Bend Wind Project in Cottonwood and Watonwan Counties, Minnesota; In the Matter of the Application of Big Bend Wind, LLC for a Route Permit for a 161 kV High Voltage Transmission Line in Cottonwood, Watonwan and Martin Counties, Minnesota.

## Declaration of Service

Peter J. Rademacher

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron	200 S 6th St Ste 4000  Minneapolis, MN 554021425	Electronic Service	Yes	OFF_SL_19-408_Official CC Service List
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400  St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_19-408_Official CC Service List
Kate	Fairman	kate.frantz@state.mn.us	Department of Natural Resources	Box 32 500 Lafayette Rd St. Paul, MN 551554032	Electronic Service	No	OFF_SL_19-408_Official CC Service List
Annie	Felix Gerth	annie.felix-gerth@state.mn.us		Board of Water & Soil Resources 520 Lafayette Rd Saint Paul, MN 55155	Electronic Service	No	OFF_SL_19-408_Official CC Service List
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280  Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_19-408_Official CC Service List
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Brenna	Gunderson	Brenna.gunderson@apexcleanenergy.com	Apex Clean Eenergy	8665 Hudson Blvd N Ste 110  Lake Elmo, MN 55042	Electronic Service	Yes	OFF_SL_19-408_Official CC Service List
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Kari	Howe	kari.howe@state.mn.us	DEED	332 Minnesota St, #E200 1ST National Bank Bldg St. Paul, MN 55101	Electronic Service	No	OFF_SL_19-408_Official CC Service List
Dylan	Ikkala	dylan.ikkala@apexcleanenergy.com	Apex Clean Energy	8665 Hudson Blvd N Ste 110  Lake Elmo, MN 55042	Electronic Service	Yes	OFF_SL_19-408_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Amy	Kania	akania@hogenadams.com	Hogen Adams PLLC	1935 County Road B2 West Suite 460 St. Paul, MN	Electronic Service	No	OFF_SL_19-408_Official CC Service List
Ray	Kirsch	Raymond.Kirsch@state.mn.us	Department of Commerce	85 7th Place E Ste 500  St. Paul, MN 55101	Electronic Service	No	OFF_SL_19-408_Official CC Service List
Karen	Kromar	karen.kromar@state.mn.us	MN Pollution Control Agency	520 Lafayette Rd  Saint Paul, MN 55155	Electronic Service	No	OFF_SL_19-408_Official CC Service List
Chris	Kunkle	chris.kunkle@apexcleanenergy.com	Apex Clean Energy	8665 Hudson Blvd North, Suite 110  Lake Elmo, MN 55042	Electronic Service	No	OFF_SL_19-408_Official CC Service List
James	LaFave	james.lafave@state.mn.us	Office of Administrative Hearings	600 N Robert Street  St. Paul, MN 55164-0620	Electronic Service	Yes	OFF_SL_19-408_Official CC Service List
Kevin	Maijala	Kevin.Maijala@mnhs.org	Minnesota Historical Society	N/A	Electronic Service	No	OFF_SL_19-408_Official CC Service List
Samantha J	Odegard	samanthao@uppersiouxcommunity-nsn.gov	Upper Sioux Tribal Community	PO Box 147  Granite Falls, MN 56241	Electronic Service	No	OFF_SL_19-408_Official CC Service List
Kevin	Pranis	kpranis@liunagroc.com	Laborers' District Council of MN and ND	81 E Little Canada Road  St. Paul, Minnesota 55117	Electronic Service	No	OFF_SL_19-408_Official CC Service List
Peter	Rademacher	prademacher@hogenadams.com		1935 County Road B2 West Suite 460 St. Paul, Minnesota 55113	Electronic Service	No	OFF_SL_19-408_Official CC Service List
Leif	Rasmussen	leif@steffensandrasmusse.com	Steffens & Rasmussen	6600 France Ave South  Edina, MN 55435	Electronic Service	No	OFF_SL_19-408_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_19-408_Official CC Service List
Stephan	Roos	stephan.roos@state.mn.us	MN Department of Agriculture	625 Robert St N  Saint Paul, MN 55155-2538	Electronic Service	No	OFF_SL_19-408_Official CC Service List
Ronald C	Schirmer	ronald.schirmer@mnsu.edu	Department of Anthropology	359 Trafton Science Center N  Mankato, MN 56001	Electronic Service	No	OFF_SL_19-408_Official CC Service List
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350  Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_19-408_Official CC Service List
Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	7400 Lyndale Ave S Ste 190  Richfield, MN 55423	Electronic Service	Yes	OFF_SL_19-408_Official CC Service List
Cheyenne	St. John	cheyenne.stjohn@lowersioux.com	Lower Sioux Tribal Community	39527 Reservation Hwy 1  Morton, MN 56270	Electronic Service	No	OFF_SL_19-408_Official CC Service List
Haley	Waller Pitts	hwallerpitts@fredlaw.com	Fredrikson & Byron, P.A.	200 S 6th St Ste 4000  Minneapolis, MN 55402	Electronic Service	Yes	OFF_SL_19-408_Official CC Service List
Cynthia	Warzecha	cynthia.warzecha@state.mn.us	Minnesota Department of Natural Resources	500 Lafayette Road Box 25 St. Paul, Minnesota 55155-4040	Electronic Service	No	OFF_SL_19-408_Official CC Service List



[illegible]

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kevin	Maijala	Kevin.Maijala@mnhs.org	Minnesota Historical Society	N/A	Electronic Service	No	OFF_SL_19-619_Official CC Service List
Samantha J	Odegard	samanthao@uppersiouxcommunity-nsn.gov	Upper Sioux Tribal Community	PO Box 147  Granite Falls, MN 56241	Electronic Service	No	OFF_SL_19-619_Official CC Service List
Peter	Rademacher	prademacher@hogenadams.com		1935 County Road B2 West  Suite 460 St. Paul, Minnesota 55113	Electronic Service	No	OFF_SL_19-619_Official CC Service List
Leif	Rasmussen	leif@steffensandrasmussen.com	Steffens & Rasmussen	6600 France Ave South  Edina, MN 55435	Electronic Service	No	OFF_SL_19-619_Official CC Service List
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_19-619_Official CC Service List
Ronald C	Schirmer	ronald.schirmer@mnsu.edu	Department of Anthropology	359 Trafton Science Center N  Mankato, MN 56001	Electronic Service	No	OFF_SL_19-619_Official CC Service List
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350  Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_19-619_Official CC Service List
Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	7400 Lyndale Ave S Ste 190  Richfield, MN 55423	Electronic Service	Yes	OFF_SL_19-619_Official CC Service List
Cheyenne	St. John	cheyenne.stjohn@lowersioux.com	Lower Sioux Tribal Community	39527 Reservation Hwy 1  Morton, MN 56270	Electronic Service	No	OFF_SL_19-619_Official CC Service List
Haley	Waller Pitts	hwallerpitts@fredlaw.com	Fredrikson & Byron, P.A.	200 S 6th St Ste 4000  Minneapolis, MN 55402	Electronic Service	Yes	OFF_SL_19-619_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron	200 S 6th St Ste 4000  Minneapolis, MN 554021425	Electronic Service	Yes	OFF_SL_19-621_Official CC Service List
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400  St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_19-621_Official CC Service List
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280  Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_19-621_Official CC Service List
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Kate M	Heins	kate.heins@apexcleanenergy.com	Apex Clean Energy	310 4th St NE Ste 200  Charlottesville, VA 22902	Electronic Service	No	OFF_SL_19-621_Official CC Service List
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November 10, 2021

## VIA ELECTRONIC FILING

Mr. William Seuffert  
Executive Secretary  
Minnesota Public Utilities Commission  
121 Seventh Place East, Suite 350  
St. Paul, MN 55101

**Re: In the Matter of the Applications of Big Bend Wind, LLC for a Certificate of Need,  
Site Permit, and Route Permit for an up to 308 MW Wind Farm and Associated  
161 kV Transmission Line in Cottonwood, Martin, and Watonwan Counties  
MPUC Docket Nos. IP-7013/CN-19-408, WS-19-619, and TL-19-621  
OAH Docket No. 60-2500-37376**

Dear Mr. Seuffert:

Enclosed for filing on behalf of the Upper Sioux Community, a federally recognized Indian nation, in the above-captioned dockets, please find the Direct Testimony of Adam Savariego, the duly elected Tribal Secretary of the Upper Sioux Community.

This correspondence and enclosures will be e-filed through [www.edockets.state.mn.us](http://www.edockets.state.mn.us). A copy of this filing will also be served upon the persons on the Official Service Lists of record.

Sincerely,

*/s/ Leif E. Rasmussen*  
Attorney for the Upper Sioux Community

Enclosures

Upper Sioux Community

MINNESOTA PUBLIC UTILITIES COMMISSION

MPUC DOCKET NOS. IP-7013/CN-19-408, WS-19-619, and TL-19-621  
OAH DOCKET NO. 60-2500-37376

DIRECT TESTIMONY OF ADAM SAVARIEGO

November 10, 2021



1  
2 **Q. Please state your name and role.**

3 A. My name is Adam Savariego. I serve as the Tribal Secretary on the Board of  
4 Trustees for the Upper Sioux Community ("Upper Sioux").  
5

6 **Q. What is the purpose of your testimony?**

7 A. The purpose of my testimony is to reaffirm Upper Sioux's support for the  
8 Settlement Agreement and to discuss Upper Sioux's position with respect to the  
9 revised Big Bend Wind Project ("Wind Project") layout, including Big Bend Wind,  
10 LLC's ("Big Bend") request for a waiver of the wind access buffer for certain specific  
11 turbine locations.  
12

13 **Q. Did Upper Sioux intervene as a party in this proceeding?**

14 A. Yes. Upper Sioux intervened as a party in this proceeding because it had concerns  
15 about the potential effects of the Wind Project, as it was proposed at that time, on  
16 the Jeffers Petroglyphs site.  
17

18 **Q. Is Upper Sioux a party to the Settlement Agreement concerning the Wind  
19 Project?**

20 A. Yes. As part of the Settlement Agreement, Big Bend agreed to increase the  
21 distance of the Wind Project's turbine locations from the Jeffers Petroglyphs site.  
22 As a result of this revised layout, in the Settlement Agreement, the parties  
23 (including Upper Sioux) "recommend[ed] that the [Minnesota Public Utilities  
24 Commission ("Commission")] issue a CN and LWECS site permit for the Wind  
25 Project consistent" with the Settlement Agreement. The Parties also agreed to  
26 support a waiver of the wind access buffer setback for certain alternative wind  
27 turbine locations.  
28

29 **Q. Why does Upper Sioux support the waiver of the wind access buffer  
30 setback?**

31 A. It is a reasonable compromise that balances competing considerations.  
32 Specifically, in the Settlement Agreement, Big Bend agreed to remove all turbine  
33 locations within seven miles of the Jeffers Petroglyphs site. To replace those lost  
34 turbine locations, Big Bend identified alternative locations, but several of these  
35 locations will require the Commission to modify its wind access buffer setback. As  
36 I understand it, the setback is not a statute or rule, but instead a policy implemented  
37 by the Commission. Here, it is appropriate to modify that policy because of  
38 competing considerations—notably, Upper Sioux's (and the other intervening  
39 parties') interest in minimizing impacts to the viewshed at Jeffers Petroglyphs. In  
40 our view, recognizing Tribal interests and minimizing those viewshed impacts  
41 outweighs the strict application of the wind access buffer setback.  
42

43 **Q. Does this conclude your Direct Testimony?**

44 A. Yes.

**In the Matter of the Applications of Big Bend Wind, LLC for a Certificate of Need, Site Permit, and Route Permit for an up to 308 MW Wind Farm and Associated 161 kV Transmission Line in Cottonwood, Martin, and Watonwan Counties**

**MPUC Docket Nos. IP-7013/CN-19-408,  
WS-19-619, and TL-19-621**

**OAH Docket No. 60-2500-37376**

**CERTIFICATE OF SERVICE**

Alicia P. Jones certifies that on the 10th day of November 2021, she e-filed true and correct copies of the following documents on behalf of Upper Sioux Community via eDockets ([www.edockets.state.mn.us](http://www.edockets.state.mn.us)):

1. Filing letter;
2. Direct Testimony of Adam Savariego; and
3. Certificate of Service.

Said documents were also served as designated on the Official Service Lists on file with the Minnesota Public Utilities Commission and as attached hereto.

/s/ Alicia P. Jones

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron	200 S 6th St Ste 4000  Minneapolis, MN 554021425	Electronic Service	Yes	OFF_SL_19-408_Official CC Service List
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400  St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_19-408_Official CC Service List
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Kari	Howe	kari.howe@state.mn.us	DEED	332 Minnesota St, #E200 1ST National Bank Bldg St. Paul, MN 55101	Electronic Service	No	OFF_SL_19-408_Official CC Service List
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Ray	Kirsch	Raymond.Kirsch@state.mn.us	Department of Commerce	85 7th Place E Ste 500  St. Paul, MN 55101	Electronic Service	No	OFF_SL_19-408_Official CC Service List
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Samantha J	Odegard	samanthao@uppersiouxcommunity-nsn.gov	Upper Sioux Tribal Community	PO Box 147  Granite Falls, MN 56241	Electronic Service	No	OFF_SL_19-408_Official CC Service List
Kevin	Pranis	kpranis@liunagroc.com	Laborers' District Council of MN and ND	81 E Little Canada Road  St. Paul, Minnesota 55117	Electronic Service	No	OFF_SL_19-408_Official CC Service List
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Stephan	Roos	stephan.roos@state.mn.us	MN Department of Agriculture	625 Robert St N  Saint Paul, MN 55155-2538	Electronic Service	No	OFF_SL_19-408_Official CC Service List
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Haley	Waller Pitts	hwallerpitts@fredlaw.com	Fredrikson & Byron, P.A.	200 S 6th St Ste 4000  Minneapolis, MN 55402	Electronic Service	Yes	OFF_SL_19-408_Official CC Service List
Cynthia	Warzecha	cynthia.warzecha@state.mn.us	Minnesota Department of Natural Resources	500 Lafayette Road Box 25 St. Paul, Minnesota 55155-4040	Electronic Service	No	OFF_SL_19-408_Official CC Service List

[illegible]

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Kevin	Maijala	Kevin.Maijala@mnhs.org	Minnesota Historical Society	N/A	Electronic Service	No	OFF_SL_19-619_Official CC Service List
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November 10, 2021

**VIA ELECTRONIC FILING**

Honorable James E. LaFave  
Administrative Law Judge  
Office of Administrative Hearings  
600 North Robert Street  
PO Box 64620  
Saint Paul, MN 55164-0620

**Re: In the Matter of the Applications of Big Bend Wind, LLC for a  
Certificate of Need, Site Permit, and Route Permit for an up to  
308 MW Wind Farm and Associated 161 kV Transmission Line  
in Cottonwood, Martin, and Watonwan Counties  
MPUC Docket Nos. IP-7013/CN-19-408, WS-19-619, and TL-19-621  
OAH Docket No. 60-2500-37376**

Dear Judge LaFave:

On behalf of Minnesota Historical Society enclosed for e-filing in the above-referenced dockets, please find the Direct Testimony of Kevin Maijala. A copy of this filing is also served upon the persons on the official service lists of record.

Sincerely,

*/s/ Valerie T. Herring*

Valerie T. Herring

VTH:ts  
Enclosure

cc: Official Service Lists

Direct Testimony  
Kevin Maijala

**STATE OF MINNESOTA  
BEFORE THE  
MINNESOTA PUBLIC UTILITIES COMMISSION**

IN THE MATTER OF THE APPLICATION OF BIG BEND  
WIND, LLC FOR A CERTIFICATE OF NEED FOR THE UP  
TO 308 MV BIG BEND WIND PROJECT IN  
COTTONWOOD AND WATONWAN COUNTIES,  
MINNESOTA

OAH DOCKET No.: 60-2500-37376  
DOCKET No. IP-7013/CN-19-408

IN THE MATTER OF THE APPLICATION OF BIG BEND  
WIND, LLC FOR A LARGE WIND ENERGY  
CONVERSION SYSTEM SITE PERMIT FOR THE UP TO 308  
MV BIG BEND WIND PROJECT IN COTTONWOOD AND  
WATONWAN COUNTIES, MINNESOTA

DOCKET No. IP-7013/WS-19-619

IN THE MATTER OF THE APPLICATION OF BIG BEND  
WIND, LLC FOR A ROUTE PERMIT FOR A 161 kV HIGH  
VOLTAGE TRANSMISSION LINE IN COTTONWOOD,  
WATONWAN AND MARTIN COUNTIES, MINNESOTA

DOCKET No. IP-7013/TL-19-621

**DIRECT TESTIMONY OF**

**KEVIN MAIJALA**

On Behalf Of

**MINNESOTA HISTORICAL SOCIETY**

November 10, 2021

## Table of Contents

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I. INTRODUCTION .....	1
II. SETTLEMENT AGREEMENT .....	2
III. CONCLUSION .....	5

1 **I. INTRODUCTION**

2

3 **Q. Please state your name and business address.**

4 A. My name is Kevin Maijala and my business address is 345 W. Kellogg Blvd., St. Paul,  
5 Minnesota 55102.

6

7 **Q. By whom are you employed and in what capacity?**

8 A. I am employed by the Minnesota Historical Society as a Senior Director.

9

10 **Q. Please summarize your qualifications and experience.**

11 A. My educational background includes a B.A. in History and Political Science from the  
12 University of Minnesota-Twin Cities and a M.A. in Museum Studies from Hampton  
13 University. I am the Senior Director of Learning Initiatives for the Minnesota  
14 Historical Society. I have been employed by Minnesota Historical Society since 1999  
15 in a variety of capacities. I have been a manager of several of the Minnesota  
16 Historical Society's historic sites, program developer, exhibit developer, curriculum  
17 writer, and director of small and large initiatives. I have extensive experience in  
18 overseeing historic properties, including daily operations, long-range planning,  
19 preservation, and construction projects.

20

21 **Q. For whom are you testifying?**

22 A. I am testifying on behalf of the Minnesota Historical Society.

23

24 **Q. What is the purpose of your testimony in this proceeding?**

25 A. The purpose of my testimony is to discuss the Minnesota Historical Society's  
26 intervention in these proceedings and to support the Settlement Agreement that was  
27 executed among several of the parties to this proceeding.

## II. SETTLEMENT AGREEMENT

**Q. Please describe the Minnesota Historical Society.**

A. The Minnesota Historical Society is an educational and cultural institution dedicated to preserving the history of the state of Minnesota. The Minnesota Historical Society operates 31 historic sites and museums throughout Minnesota. One of these 31 historic sites and museums is the Jeffers Petroglyphs historic site located in Delton Township in Cottonwood County, Minnesota.

**Q. Please describe the Jeffers Petroglyphs site.**

A. The Jeffers Petroglyphs site is an internationally significant Native American sacred site and the location of the largest group of Indigenous petroglyphs (rock carvings) in the Midwestern United States. Situated in Dakota homeland, it is sacred to multiple Native American nations, including the Cheyenne, Arapaho, Iowa, and Ojibwe. The Jeffers Petroglyphs site became part of the statutorily-defined Minnesota State Historic Sites Network in 1965 and was listed in the National Register of Historic Places in 1970. The site is open to the public annually from April through October, with up to 10,000 people visiting per year. Jeffers Petroglyphs site remains open and accessible every day of the year for Native American spiritual activities. The site has a ceremonial use protocol in place to ensure Native American spiritual practitioners have private access if needed.

**Q. Please describe the proposed Big Bend Wind Project.**

A. On November 9, 2020, Big Bend Wind, LLC (Big Bend) filed applications for a certificate of need, a site permit, and a route permit for a proposed up to 308 megawatt (MW) large wind energy conversion system and an approximately 18-mile 161 kV transmission line (Big Bend Wind Project). The site permit application included a proposed wind turbine layout with between 54 and 55 wind turbines that range in height from 612 feet to 656 feet tall. As proposed in the site permit application, the Big Bend Wind Project would have placed wind turbines as close as approximately



1 five miles from the Jeffers Petroglyphs site. Also on November 9, 2020, Red Rock  
2 Solar, LLC filed an application for a certificate of need and a site permit for an up to  
3 60 MW solar generating facility (Red Rock Solar Project).<sup>1</sup>  
4

5 **Q. Why did the Minnesota Historical Society formally intervene in the Minnesota**  
6 **Public Utilities Commission (Commission) proceedings related to the Big Bend**  
7 **Wind Project?**

8 A. The Minnesota Historical Society formally intervened in these proceedings to ensure  
9 that impacts to the Jeffers Petroglyphs site from the proposed Big Bend Wind Project  
10 were either avoided or minimized to the greatest extent possible. The Jeffers  
11 Petroglyphs site is surrounded by native prairie and farmland and the addition of wind  
12 turbines that are more than 600 feet tall into this landscape will alter the viewshed  
13 from this historic site.  
14

15 **Q. Did any other parties express concerns about the proximity and potential impacts**  
16 **of the Big Bend Wind Project to the Jeffers Petroglyphs site?**

17 A. Yes. The Lower Sioux Indian Community in the State of Minnesota (Lower Sioux)  
18 and the Upper Sioux Community (Upper Sioux) also formally intervened in these  
19 proceedings and filed comments expressing concern about the potential impacts of the  
20 Big Bend Wind Project on the Jeffers Petroglyphs site.  
21

22 **Q. Earlier you stated that several parties had entered into a Settlement Agreement,**  
23 **when was this Settlement Agreement executed?**

24 A. On August 10, 2021, Big Bend, Red Rock, Apex Clean Energy Holdings, LLC, Lower  
25 Sioux, Upper Sioux, and the Minnesota Historical Society (“Settling Parties”) met for  
26 an informal mediation at the Jeffers Petroglyphs site. As a result of this informal  
27 mediation, the Settling Parties entered into a settlement agreement that was finalized  
28 on September 14, 2021 (Settlement Agreement) and filed with the Commission the  
29 same day.

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<sup>1</sup> See Docket Nos. IP-7014/CN-19-486 and IP-7014/GS-19-620.

1 **Q. Please summarize the key aspects of the Settlement Agreement.**

2 A. The key aspect of the Settlement Agreement is that it removes at least eight wind  
3 turbines that are located closest to the Jeffers Petroglyphs site and relocates five of  
4 these turbines to locations that are at least seven miles from the site. In addition, as  
5 part of the Settlement Agreement, Big Bend agrees that it will not construct two other  
6 wind turbines (Turbines T19 and T20) that are between 6.5 and seven miles of the  
7 Jeffers Petroglyphs site if the Commission approves one or more of Big Bend's  
8 alternative wind turbine locations. With this revised layout, the Minnesota Historical  
9 Society, the Upper Sioux, and Lower Sioux agreed to not contest a finding by the  
10 Commission that the Big Bend Wind Project would not have a significant adverse  
11 effect on the Jeffers Petroglyphs Site that cannot be avoided and that appropriate  
12 treatments will be in place to avoid and mitigate any adverse effect.

13  
14 **Q. Does the Minnesota Historical Society support the Commission granting a waiver  
15 of the wind access buffer setback outlined in the Settlement Agreement and as  
16 requested by Big Bend in its Direct Testimony filed on October 1, 2021?**

17 A. Yes. An important part of this Settlement Agreement is ensuring that there are  
18 constructible alternative turbine locations for the wind turbines that will be relocated  
19 under the revised layout. A waiver of the wind access buffer setback will allow Big  
20 Bend to construct wind turbines in locations that are farther from the Jeffers  
21 Petroglyphs site and minimize the impacts to the site.

22  
23 **Q. Are there other key provisions of the Settlement Agreement that were important  
24 to the Minnesota Historical Society?**

25 A. Yes. Under the terms of the Settlement Agreement, Big Bend, Red Rock Solar, and  
26 Apex agreed not to develop, construct, or own any future wind turbines within 8 miles  
27 of the Jeffers Petroglyphs site and to not assign any of their existing leases or  
28 easements within this same 8-mile buffer. Another key provision was related to  
29 community education. Under the Settlement Agreement, the Settling Parties agreed to  
30 work together to develop educational and interpretative materials around renewable

1 energy, tribal culture, and historic preservation that could be utilized at the Jeffers  
2 Petroglyphs site. All tribal cultural educational materials would be approved by Upper  
3 Sioux and Lower Sioux.

4  
5 **Q. Why does the Minnesota Historical Society support the Settlement Agreement?**

6 A. Like any settlement agreement, this Settlement Agreement is a compromise. While  
7 the wind turbines will still be visible from the Jeffers Petroglyphs under the revised  
8 layout set forth in the Settlement Agreement, the wind turbines will be located farther  
9 away from the Jeffers Petroglyphs site as compared to the initial site permit  
10 application. After reviewing the visual impact assessment associated with the revised  
11 layout, the Minnesota Historical Society believes that the Settlement Agreement  
12 strikes an appropriate balance between construction of the Big Bend Wind Project and  
13 impacts on the Jeffers Petroglyphs site.

14  
15 **III. CONCLUSION**

16  
17 **Q. Does this conclude your pre-filed Direct Testimony?**

18 A. Yes.

In the Matter of the Applications of Big Bend  
Wind, LLC for a Certificate of Need, Site  
Permit, and Route Permit for an up to 308 MW  
Wind Farm and Associated 161 kV  
Transmission Line in Cottonwood, Martin, and  
Watonwan Counties, Minnesota

MPUC Docket Nos. IP-7013/CN-19-408,  
WS-19-619, and TL-19-621

OAH Docket No. 60-2500-37376

### **CERTIFICATE OF SERVICE**

Theresa A. Senart certifies that on the 10th day of November, 2021, she filed a true and correct copy of the **Direct Testimony of Kevin Maijala** on behalf of Minnesota Historical Society by posting the same on [www.edockets.state.mn.us](http://www.edockets.state.mn.us). Said Direct Testimony has also been served via U.S. Mail or e-mail as designated on the attached Official Service Lists on file with the Minnesota Public Utilities Commission in the above-referenced dockets.

s/ Theresa A. Senart

Theresa A. Senart

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron	200 S 6th St Ste 4000  Minneapolis, MN 554021425	Electronic Service	Yes	OFF_SL_19-408_Official CC Service List
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400  St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_19-408_Official CC Service List
Kate	Fairman	kate.frantz@state.mn.us	Department of Natural Resources	Box 32 500 Lafayette Rd St. Paul, MN 551554032	Electronic Service	No	OFF_SL_19-408_Official CC Service List
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Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_19-408_Official CC Service List
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Joyce	Janzen	N/A		PO Box 365  Mountain Lake, MN 56159	Paper Service	No	SPL_SL_19-619_Project Contact List

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